

Exhibit O

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COMMONWEALTH OF MASSACHUSETTS

MIDDLESEX, SS.

SUPERIOR COURT
DEPARTMENT OF THE
TRIAL COURT

BRYCE ZUNDEL and DIANE ZUNDEL,)
)
Plaintiffs,) CIVIL ACTION NO.:
)
vs.) 22-2145
)
AMERILURE, INC., et al.,)
)
Defendants.)

- - -

Deposition of WILLIAM E. LONGO, PH.D.,
taken on behalf of the Defendants, pursuant to
Notice, in accordance with the Massachusetts
Rules of Civil Procedure, before Louise
Griffith, Certified Court Reporter, at 6470 East
Johns Crossing, Suite 160, Johns Creek, Georgia,
on the 30th day of May, 2023, commencing at the
hour of 11:19 a.m.

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1 **A Scheduling.**

2 **Q Okay.**

3 **A The PLM analysis is very tedious and long.**

4 **By TEM, we have three different analysts all**
5 **qualified to do that. Chrysotile was really up to**
6 **one person in our lab, but now we're going to have**
7 **three as we get --**

8 **Q And the one person being Mr. Hess?**

9 **A -- as we get people trained.**

10 **Q Just want to make it clear. Clarify.**

11 **A Yes.**

12 **Q Mr. Hess is the one that's trained now?**

13 **A He's the one that has been trained and has**
14 **been doing this and has given a lot of insight on**
15 **solving analytical issues.**

16 **Q And you're training more people --**

17 **A Yes.**

18 **Q -- in PLM?**

19 **A Correct.**

20 **Q Okay. But TEM is -- doesn't require the**
21 **same level of training. Fair?**

22 **A It's fair in that it's not as, to me -- and**
23 **I was an electron microscopy person. It is not as**
24 **complicated as PLM.**

25 **Q Okay. And the analyst for the TEM work was**

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1 C E R T I F I C A T E

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3 STATE OF GEORGIA:

4 COUNTY OF DEKALB:

5 I hereby certify that the foregoing
6 transcript was taken down as stated in the
7 caption, that the witness was first duly sworn,
8 and the questions and answers thereto were
9 reduced to typewriting under my direction; that
10 the foregoing pages 1 through 291 represent a
11 true, correct, and complete transcript of the
12 evidence given upon said hearing, and I further
13 certify that I am not of kin or counsel to the
14 parties in the case; am not in the regular
15 employ of counsel for any of said parties; nor
16 am I in anywise interested in the result of said
17 case. The witness did reserve the right to read
18 and sign the transcript.

19

This, the 8th day of June, 2023.

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23

LOUISE GRIFFITH, CCR-B-2121
Certified Court Reporter

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